

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

PAUL D. ETIENNE, et al.,

Plaintiffs,

v.

ROBERT W. FERGUSON, in his official
capacity as Governor of Washington, et al.,

Defendants.

No. 3:25-cv-05461-DGE

**STIPULATED MOTION TO RE-NOTE
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION AND
EXTEND DEADLINES
AND**

[PROPOSED] ORDER

**NOTE ON MOTION CALENDAR:
JUNE 13, 2025**

Plaintiffs Paul D. Etienne, Joseph J. Tyson, Thomas A. Daly, Frank R. Schuster, Eusebio L. Elizondo, Gary F. Lazzeroni, Gary M. Zender, Robert Pearson, Lutakome Nsubuga, Jesús Mariscal, and Michael Kelly ("Plaintiffs") and Defendants Robert W. Ferguson, in his official capacity as Governor of Washington and Nicholas W. Brown, in his official capacity as Attorney General of Washington (collectively "State Defendants") jointly move the Court to re-note Plaintiffs' Motion for Preliminary Injunction (Dkt. 65) ("Motion") and to extend certain filing deadlines as set out below. The Parties request modest extensions to the current deadlines in light of the State Defendants' counsel's travel plans and other case commitments. The Parties' proposed deadline extensions will not alter the July 14, 2025 hearing date on Plaintiffs' Motion.

STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES
(No. 3:25-cv-05461-DGE)

CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 · Seattle, WA 98101
(206) 209-0456
www.crowleylawoffices.com

Specifically, the Parties request that the State Defendants' deadline to file and serve any opposition to Plaintiffs' Motion be extended from June 26, 2025, *see* Local Rule 7(d)(4), to June 30, 2025. The Parties likewise request that the Plaintiffs' deadline to file and serve any reply papers be extended from July 3, 2025, *id.*, to July 7, 2025. The Parties request that the Motion be re-noted from July 3, 2025 to July 7, 2025 to permit the extended briefing deadlines.

The Parties further request that State Defendants' deadline to respond to the Complaint be extended from June 27, 2025, which is 21 days after they were served with the summons and complaint, *see* Fed. R. Civ. P. 12(b)(a)(1)(A), to 21 days after the Court rules on Plaintiffs' Motion. The table below reflects the modest extensions requested by the Parties:

	Current Date	Amended Date
Noting Date for Plaintiffs' Motion for Preliminary Injunction	July 3, 2025	July 7, 2025
State Defendants' Deadline to File and Serve Opposition to Plaintiffs' Motion for Preliminary Injunction	June 26, 2025	June 30, 2025
Plaintiffs' Deadline to File and Serve Reply Papers in Support of Motion for Preliminary Injunction	July 3, 2025	July 7, 2025
State Defendants' Deadline to Respond to Complaint	June 27, 2025	21 days after Court rules on Plaintiffs' Motion.

IT IS SO STIPULATED by and between the Parties.

* * *

//
//

STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES
(No. 3:25-cv-05461-DGE)

CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 · Seattle, WA 98101
(206) 209-0456
www.crowleylawoffices.com

I certify that this memorandum contains 370 words, in compliance with the Local Civil Rules.

DATED: June 13, 2025

NICHOLAS W. BROWN
Attorney General

By: /s/ Alicia O. Young

ALICIA O. YOUNG, WSBA 35553
KELLY A. PARADIS, WSBA 47175
EMMA GRUNBERG, WSBA 54659
Deputy Solicitors General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
Alicia.Young@atg.wa.gov
Kelly.Paradis@atg.wa.gov
Emma.Grunberg@atg.wa.gov
360-753-6200

*Attorneys for Defendants Robert W.
Ferguson, Governor of Washington, and
Nicholas W. Brown, Attorney General of
Washington*

By: /s/ William J. Crowley

William J. Crowley, WSBA # 18499
CROWLEY LAW OFFICES, P.S.
600 University Street
Suite 1708
Seattle, WA 98101
Tel: (206) 224-7069
will@crowleylawoffices.com

Matthew T. Martens (*pro hac vice*)
Siddharth Velamoor, WSBA #40965
Donna Farag (*pro hac vice*)
Zachary Halpern (*pro hac vice*)
WILMER CUTLER PICKERING HALE AND
DORR LLP
2100 Pennsylvania Avenue, NW
Washington, DC 20037
Tel: (202) 663-6000
Fax: (202) 663-6363
matthew.martens@wilmerhale.com
siddharth.velamoor@wilmerhale.com
donna.farag@wilmerhale.com
zac.halpern@wilmerhale.com

Leah M. Fugere (*pro hac vice*)
WILMER CUTLER PICKERING HALE AND
DORR LLP
350 South Grand Avenue
Suite 2400
Los Angeles, CA 90071
Tel: (213) 443-5300
Fax: (213) 443-5400
leah.fugere@wilmerhale.com

Robert Kingsley Smith (*pro hac vice*)
WILMER CUTLER PICKERING HALE AND
DORR LLP
60 State Street

STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES
(No. 3:25-cv-05461-DGE)

CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 · Seattle, WA 98101
(206) 209-0456
www.crowleylawoffices.com

Boston, MA 02109
Tel: (617) 526-6000
Fax: (617) 526-5000
robert.smith@wilmerhale.com

Mark L. Rienzi (*pro hac vice*)
Eric C. Rassbach (*pro hac vice*)
William J. Haun (*pro hac vice*)
Laura Wolk Slavis (*pro hac vice*)
BECKET FUND FOR RELIGIOUS LIBERTY
1919 Pennsylvania Ave NW, Suite 400
Washington, D.C. 20006
Tel: (202) 955-0095
mrienzi@becketfund.org
erassbach@becketfund.org
whaun@becketfund.org
lslavis@becketfund.org

Hiram S. Sasser, III (*pro hac vice*)
Jeremy Dys (*pro hac vice*)
Chris Motz (*pro hac vice*)
FIRST LIBERTY INSTITUTE
2001 W. Plano Pkwy., Ste. 1600
Plano, Texas 75075
Tel: (972) 941-4444
Fax: (972) 941-4457
hsasser@firstliberty.org
jdys@firstliberty.org
cmotz@firstliberty.org

Attorneys for Plaintiffs

STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES
(No. 3:25-cv-05461-DGE)

CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 · Seattle, WA 98101
(206) 209-0456
www.crowleylawoffices.com

[PROPOSED] ORDER**PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.**

The Court GRANTS the Stipulated Motion to Re-Note Plaintiffs' Motion for Preliminary Injunction (Dkt. 65) ("Motion") and to Extend Deadlines. The noting date for Plaintiffs' Motion and the Parties' filing deadlines shall be amended as follows:

	Current Date	Amended Date
Noting Date for Plaintiffs' Motion for Preliminary Injunction	July 3, 2025	July 7, 2025
State Defendants' Deadline to File and Serve Opposition to Plaintiffs' Motion for Preliminary Injunction	June 26, 2025	June 30, 2025
Plaintiffs' Deadline to File and Serve Reply Papers in Support of Motion for Preliminary Injunction	July 3, 2025	July 7, 2025
State Defendants' Deadline to Respond to Complaint	June 27, 2025	21 days after Court's ruling on Plaintiffs' Motion for Preliminary Injunction (Dkt. 65)

IT IS SO ORDERED.

DATED this ____ day of _____, 2025

HONORABLE DAVID G. ESTUDILLO
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

By: /s/ William J. Crowley
William J. Crowley, WSBA # 18499
CROWLEY LAW OFFICES, P.S.
600 University Street

[PROPOSED] ORDER GRANTING
STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES
(No. 3:25-cv-05461-DGE)

CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 · Seattle, WA 98101
(206) 209-0456
www.crowleylawoffices.com

Suite 1708
Seattle, WA 98101
Tel: (206) 224-7069
will@crowleylawoffices.com

Matthew T. Martens (*pro hac vice*)
Siddharth Velamoor, WSBA #40965
Donna Farag (*pro hac vice*)
Zachary Halpern (*pro hac vice*)
WILMER CUTLER PICKERING HALE AND
DORR LLP
2100 Pennsylvania Avenue, NW
Washington, DC 20037
Tel: (202) 663-6000
Fax: (202) 663-6363
matthew.martens@wilmerhale.com
siddharth.velamoor@wilmerhale.com
donna.farag@wilmerhale.com
zac.halpern@wilmerhale.com

Leah M. Fugere (*pro hac vice*)
WILMER CUTLER PICKERING HALE AND
DORR LLP
350 South Grand Avenue
Suite 2400
Los Angeles, CA 90071
Tel: (213) 443-5300
Fax: (213) 443-5400
leah.fugere@wilmerhale.com

Robert Kingsley Smith (*pro hac vice*)
WILMER CUTLER PICKERING HALE AND
DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6000
Fax: (617) 526-5000
robert.smith@wilmerhale.com

Mark L. Rienzi (*pro hac vice*)
Eric C. Rassbach (*pro hac vice*)
William J. Haun (*pro hac vice*)
Laura Wolk Slavis (*pro hac vice*)
BECKET FUND FOR RELIGIOUS LIBERTY

[PROPOSED] ORDER GRANTING
STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES
(No. 3:25-cv-05461-DGE)

CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 · Seattle, WA 98101
(206) 209-0456
www.crowleylawoffices.com

1 1919 Pennsylvania Ave NW, Suite 400
2 Washington, D.C. 20006
3 Tel: (202) 955-0095
4 mrienzi@becketfund.org
5 erassbach@becketfund.org
6 whaun@becketfund.org
7 lsavis@becketfund.org

8 Hiram S. Sasser, III (*pro hac vice*)
9 Jeremy Dys (*pro hac vice*)
10 Chris Motz (*pro hac vice*)
11 First Liberty Institute
12 2001 W. Plano Pkwy., Ste. 1600
13 Plano, Texas 75075
14 Tel: (972) 941-4444
15 Fax: (972) 941-4457
16 hsasser@firstliberty.org
17 jdys@firstliberty.org
18 cmotz@firstliberty.org

19 *Attorneys for Plaintiffs*

20 NICHOLAS W. BROWN
21 Attorney General

22 By: /s/Alicia O. Young
23 ALICIA O. YOUNG, WSBA 35553
24 KELLY A. PARADIS, WSBA 47175
25 EMMA GRUNBERG, WSBA 54659
26 Deputy Solicitors General
27 1125 Washington Street SE
28 PO Box 40100
Olympia, WA 98504-0100
Alicia.Young@atg.wa.gov
Kelly.Paradis@atg.wa.gov
Emma.Grunberg@atg.wa.gov
360-753-6200

*Attorneys for Defendants Robert W. Ferguson,
Governor of Washington, and Nicholas W. Brown,
Attorney General of Washington*

[PROPOSED] ORDER GRANTING
STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES
(No. 3:25-cv-05461-DGE)

CROWLEY LAW OFFICES, P.S.
600 University Street, Suite 1708 · Seattle, WA 98101
(206) 209-0456
www.crowleylawoffices.com